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**APPLICATION DENIED**  
**SO ORDERED**   
**VERNON S. BRODERICK**  
**U.S.D.J.** 6/26/2019

June 25, 2019

If, after reviewing the parties' submissions, I determine that oral argument is necessary, I will so notify the parties.

VIA ECF

Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square, Courtroom 518  
New York, NY 10007

**Re: Vale S.A. v. BSG Resources Limited, Case No. 19-cv-3619-VSB**

Dear Judge Broderick:

This firm represents Respondent BSG Resources Limited in this case. I write on Respondent's behalf respectfully to request oral argument on Respondent's Cross-Motion to Dismiss or, in the Alternative, to Adjourn the Decision on the Enforcement of the Award (ECF No. 19). This case arises from a lengthy litigation history between the parties in the United Kingdom and relates to a Chapter 15 bankruptcy petition pending in the Bankruptcy Court for the Southern District of New York and an administration pending before The Guernsey Royal Court. Oral argument will assist the Court in addressing the substantial legal and factual issues in the parties' briefing.

Respectfully submitted,

/s/ Frederick D. (Rick) Hyman  
Frederick D. (Rick) Hyman

cc: Counsel of record